

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION

HEADWATER RESEARCH LLC,

*Plaintiff and Counterclaim-Defendant,*

v.

Cellco Partnership d/b/a Verizon Wireless *et al.*,

*Defendants and Counterclaimant-Plaintiffs.*

HEADWATER RESEARCH LLC,

*Plaintiff and Counterclaim-Defendant,*

v.

T-MOBILE USA, INC *et al.*,

*Defendants and Counterclaimant-Plaintiffs.*

HEADWATER RESEARCH LLC,

*Plaintiff and Counterclaim-Defendant,*

v.

AT&T SERVICES, INC. *et al*

*Defendants and Counterclaimant-Plaintiffs.*

Case No. 2:25-cv-00156-JRG-RSP

(Lead Case)

Case No. 2:25-cv-00164-JRG-RSP

(Member Case)

Case No. 2:25-cv-00215-JRG-RSP

(Member Case)

**JOINT MOTION FOR ENTRY OF  
PROTECTIVE ORDER & DISCOVERY ORDER**

Plaintiff Headwater Research, LLC (“Headwater”) and Defendants Cellco Partnership d/b/a Verizon Wireless *et al.*, T-Mobile USA, Inc. *et al*, and AT&T Services, Inc. *et al*, (collectively, “Defendants”), (collectively, the “Parties”) file this Joint Motion for entry of the proposed Protective Order, attached as Exhibit A, and the proposed Discovery Order, attached as Exhibit B.

Dated: July 2, 2025

/s/ Christian Hurt

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served on July 2, 2025, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

*/s/ Jason Wietholter* \_\_\_\_\_  
Jason Wietholter

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). The parties are in agreement on filing this Joint Motion.

*/s/ Jason Wietholter*  
Jason Wietholter